## REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present Amendment is being made to facilitate prosecution of the application.

### I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1, 2, 7-9, 12-14, 23, 24, 28-31, 34-36, 45-47 and 49 are pending. Claims 1, 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49, which are independent, are hereby amended. No new matter has been added. Support for this amendment is provided throughout the Specification as originally filed and specifically on page 33 (paragraph [0119]). It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

# II. REJECTIONS UNDER 35 U.S.C. §103

Claims 1-2, 7, 9, 12, 13, 23-24, 28, 29, 31, 34, 35, 45-47 and 49 were rejected under 35 U.S.C. §103(a) as allegedly anticipated by U.S. Patent No. 6,195,090 to Riggins, III (hereinafter, merely "Riggins") in view of U.S. Publication No. 2002/0090217 to Limor et al. (hereinafter, merely "Limor").

Claims 8, 14, 30 and 36 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Riggins in view of Limor and further in view of US 2005/0198668 A1 to Yuen, et al. (hereinafter, merely "Yuen").

#### III. RESPONSE TO REJECTIONS

Claim 1 recites, inter alia:

"...a multiplex processing section for multiplexing on a digital broadcast signal of the corresponding program GPS position information received from the movable body, both 1) GPS position information received from an imaging apparatus that is operable to acquire imaging area information concerning the corresponding program and is disposed mechanically independent of a movable body that is an object in the corresponding program, and 2) mapping information, which indicates position information of the movable body and position information of the imaging apparatus on a map, a display for displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section. (Emphasis added)

Claim 1 generally relates to a system where BOTH:

1) GPS position information received from an imaging apparatus, and 2) mapping information, which indicates position information of the movable body and position information of the imaging apparatus on a map,

are multiplexed on a digital broadcast signal; and

a positional relationship between the movable bodies are displayed on the screen as a function of the multiplexing processing section.

Applicants submit that neither Riggins nor Limor, taken alone or in combination, teaches or suggests the above identified features of claim 1.

Specifically, on page 4 of the Office Action, the Office Action asserts that Riggins teaches mapping on a map the position information of a movable body and an image apparatus.

However, Applicants submit that in the Riggins system, the telemetry acquiring and transmitting device 41 comprises a plurality of sensors 71 for collecting local global

positioning satellite data including latitude, longitudinal, and altitude from global positioning satellites and from an optional local global positioning satellite transmitter, and then all these collected data is multiplexed by the digital multiplexer 74 (See, Riggins, col.7, lines 28-33 and Fig. 4).

Thus, in Riggins only the local global positioning satellite data is multiplexed and there is no map information multiplexed in the system.

In the present invention, as shown in Fig. 6, the mapping information S4, which indicates the positions of the movable bodies (vehicles) and the imaging cameras on a map, is multiplexed by the multiplex section, so that on a screen display shown in Fig. 12, a mapping screen 86 shows the positions of vehicles and imaging cameras that are mapped on a map (See, Specification, page 33, paragraph [0119], page 43, paragraph [0153], Fig. 6 and 12), and because the positions of movable bodies and imaging cameras may be ascertained on a map, the positional relations between the movable bodies are shown on the screen (See, Specification, page 46, paragraph [0160]).

Thus, in the present invention, the position information of the movable body and the imaging apparatus on a map is multiplexed on the digital broadcast signal and positional relations between the movable bodies are shown on the screen.

Nothing has been found in Riggins that teaches a multiplex processing section for multiplexing on a digital broadcast signal of the corresponding program GPS position information received from the movable body, both 1) GPS position information received from an imaging apparatus that is operable to acquire imaging area information concerning the corresponding program and is disposed mechanically independent of a movable body that is an object in the corresponding program, and 2) mapping information, which indicates position

information of the movable body and position information of the imaging apparatus on a map, a display for displaying a positional relationship between the movable bodies on the screen as a function of the multiplexing processing section, as recited in claim 1.

Limor does not provide disclosure missing in Riggins.

Therefore, Applicants submit that independent claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, independent claims 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49 are patentable.

#### IV. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Similarly, because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

#### **CONCLUSION**

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested

that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted, FROMMER LAWRENCE & HAUG LLP Attorneys for Applicants

> Thomas F. Presson Reg. No. 41,442 (212) 588-0800